

39
1-29-03
SC

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

GREATER DELAWARE VALLEY
SAVINGS BANK

v.

STEVEN B. KING
4073 SHELL ROAD
SARASOTA, FL 34242

CIVIL ACTION

NO. 01-1117

Judge Yvette Kane

FILED
HARRISBURG, PA

JAN 28 2003

MARY E. D'ANDREA, CLERK
Per 9/18
Deputy Clerk

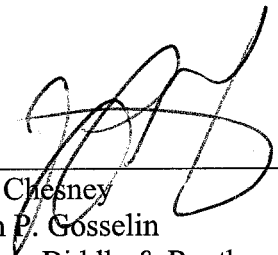
MOTION FOR ENTRY OF DEFAULT JUDGMENT

Plaintiff, Greater Delaware Valley Savings Bank ("GDVSB"), by and through its attorneys, Drinker Biddle & Reath LLP, hereby moves for entry of a default judgment pursuant to Federal Rule 55(b)(1), and in support thereof, avers as follows:

1. This action arises out of a scheme orchestrated by Defendant Steven B. King and others for the purpose of defrauding entities such as GDVSB, which purchased commercial loans and mortgages in the secondary mortgage market.
2. As a result of King's fraudulent and unlawful conduct, GDVSB suffered an actual loss in the amount of \$363,968.92. In Count I of the Complaint, GDVSB sought treble damages pursuant to the Racketeer Influenced and Corrupt Organization Act, 18 U.S.C. §1962, et seq. The total amount claimed was \$1,091,906.70.
3. On August 28, 2002, the Court, per the Honorable Yvette Kane, ordered that the Clerk of Court enter default against defendant Steven B. King pursuant to Federal Rule of Civil Procedure 55(a). See Order attached hereto as Exhibit A.
4. Upon information and belief, the Clerk entered a default against Defendant King on September 10, 2002.

5. Because the amount of GDVSB's claim against Defendant King is for a sum certain, GDVSB hereby requests that the Clerk of Court enter default judgment in favor of GDVSB in the amount of \$1,091,906.70, pursuant to Federal Rule of Civil Procedure 55(b)(1). A proposed Order is attached hereto as Exhibit B.

WHEREFORE, GDVSB respectfully requests that this Honorable Court enter judgment in the amount of \$1,091,906.70, in favor of Greater Delaware Valley Savings Bank and against defendant Steve B. King.



John Chesney
Jason P. Gosselin
Drinker Biddle & Reath
One Logan Square
18th & Cherry Streets
Philadelphia, PA 19103-6996
(215) 988-3371

Attorneys for Plaintiff Greater
Delaware Valley Savings Bank

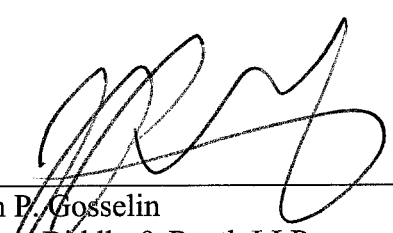
Date: January 27, 2003

CERTIFICATE OF SERVICE

I, Jason P. Gosselin, hereby certify that on January 27, 2003, I served a copy of the foregoing Motion for Entry of Default Judgment via first class U.S. mail return receipt requested, and first class U.S. regular mail, as follows:

Steven B. King
4073 Shell Road
Sarasota, FL 34242

Steven B. King
5053 Ocean Blvd.
Sarasota, FL 34242



Jason P. Gosselin
Drinker Biddle & Reath LLP
One Logan Square
18th & Cherry Streets
Philadelphia, PA 19103-6996